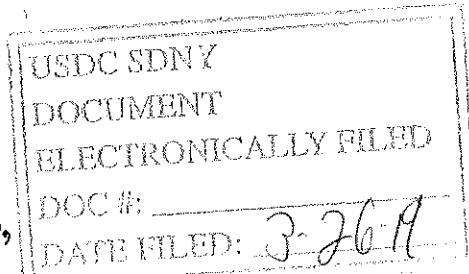




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March 25, 2019

VIA ECF

The Honorable Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

3/26/2019
The Second Amended Complaint may be filed. The clerk is directed to close the matter at 4:42:51.
Wonderful

Re: Irene Politis v. The Trustees of Columbia University in the City of New York and Thomas Harford, No. 1:18-cv-07831 (PAC) (S.D.N.Y.) *Paul A. Crotty (cc)*

Dear Judge Crotty:

This is a joint letter submitted on behalf of Plaintiff, Defendant The Trustees of Columbia University in the City of New York ("Columbia"), and Defendant Thomas Harford.

In Plaintiff's Opposition to Columbia's Rule 11 Motion (Dkt. 51), Plaintiff offered to rephrase disputed language in the operative complaint concerning the circumstances leading to Plaintiff's departure from Columbia housing. The parties have since conferred, and Defendants have consented to Plaintiff filing a Second Amended Complaint that rephrases the disputed language. Exhibit A to this letter shows the proposed modifications to the complaint in redline.

Federal Rule of Civil Procedure 15(a)(2) states that leave to amend a pleading should be "freely give[n] . . . when justice so requires." Under the liberal standard of Rule 15(a)(2), leave to amend "should not be denied unless there is evidence of undue delay, undue prejudice to the defendant, bad faith, or futility." *Milanesi v. Rust-Oleum Corp.*, 244 F.3d 104, 110 (2d Cir. 2001) (citing *Foman v. Davis*, 371 U.S. 178, 182 (1962)). Here, all parties agree that justice is served by